

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

Case No.

6:06-cr-189-ORL-JGG

18 U.S.C. § 201(c)

18 U.S.C. § 209

v.

BONNIE MURPHY

INDICTMENT

The Grand Jury charges:

COUNT ONE
Illegal Gratuity
(18 U.S.C. § 201(c))

At all times relevant to this indictment:

1. The defendant, BONNIE MURPHY, was employed as a public official by the Defense Reutilization and Marketing Service (DRMS), a component of the Department of Defense (DOD). The defendant's residence is in Indialantic, Florida, in the Middle District of Florida.
2. The DRMS was responsible for managing and disposing of surplus DOD property. In or about December 2003, the defendant deployed to the Republic of Iraq to support the United States Army forces stationed there. As part of a team of DRMS employees, she was responsible for receiving, managing, and disposing of surplus property, including hazardous materials.
3. The defendant was stationed at Camp Anaconda and Camp Victory, Iraq. While there, she was authorized to identify problem areas, request service contracts, and recommend specific contractors to perform such contracts. She was also authorized to act as a contracting officer's representative (COR). In this capacity, she

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ORLANDO, FLORIDA

authorized work, monitored performance, and certified invoices submitted by contractors.

4. Company A was a construction and contracting service owned by two Iraqi nationals.

5. From in or about July 2004 through in or about October 2004, Company A was awarded three service contracts by the United States government. The first contract retained Company A to remove and dispose of hazardous waste. The second contract retained Company A to remove contaminated soil. The third contract retained Company A to remove and store used lithium batteries.

6. For each of the three contracts, the defendant wrote a Statement of Work requesting that the United States government hire someone to perform the service, and she orally recommended that the contracting officer hire Company A. The defendant also wrote a sole source justification letter recommending that Company A be awarded the battery storage contract without undergoing a competitive bidding process. Once awarded, the defendant acted as the COR for each contract. She authorized Company A to perform services, monitored their performance, and verified their invoices.

7. From in or about August 2004 through in or about January 2005, the defendant certified Company A invoices for payment on all three contracts totaling approximately \$5,700,000.

8. From in or about July 2004 through in or about December 2004, the defendant accepted several pieces of gold jewelry from the owners and employees of Company A for and because of the above official acts she performed. The items had an appraised value of approximately \$9,000.

9. From in or about July 2004 until in or about December 2004, in the Republic of Iraq, in the extraterritorial jurisdiction of the United States, the defendant BONNIE MURPHY, being a public official, otherwise than as provided by law for the proper discharge of official duty, directly and indirectly demanded, sought, received, accepted, and agreed to receive and accept things of value personally for and because of an official act performed and to be performed by her; that is, defendant BONNIE MURPHY did receive and accept several pieces of gold jewelry from the owners and employees of Company A for and because of official acts she performed, including, but not limited to, composing a Statement of Work for each of the contracts, orally recommending that Company A be hired for each of the contracts, writing a sole source justification letter recommending that Company A be awarded the lithium battery contract without a competitive bidding process, authorizing Company A to perform services, and certifying Company A invoices for payment.

All in violation of Title 18, United States Code, Section 201(c), and pursuant to Title 18, United States Code, Section 3238.

COUNT TWO

**Conflict of Interest: Supplementation of Government Salary
(18 U.S.C. §§ 209(a), 216(a)(2))**

10. All allegations made in paragraphs one through eight are re-alleged and incorporated herein.

11. From in or about July 2004 until in or about December 2004, in the Republic of Iraq, in the extraterritorial jurisdiction of the United States, defendant BONNIE MURPHY knowingly and willfully received several pieces of gold jewelry from

the owners and employees of Company A, which payments were contributions to and supplementation of her salary, for her services as an officer and employee of the executive branch of the United States Government.

All in violation of Title 18, United States Code, Sections 209(a) and 216(a)(2), and pursuant to Title 18, United States Code, Section 3238.

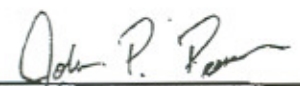
A TRUE BILL,


Foreperson

By:

EDWARD C. NUCCI
Acting Chief
Public Integrity Section

By:



JOHN P. PEARSON
Trial Attorney
Public Integrity Section
Criminal Division
United States Department of Justice
1400 New York Ave., NW
Washington, DC 20005
(202) 307-2281

UNITED STATES DISTRICT COURT

Middle District of Florida
Orlando Division

THE UNITED STATES OF AMERICA

vs.

BONNIE MURPHY

INDICTMENT

Violations:

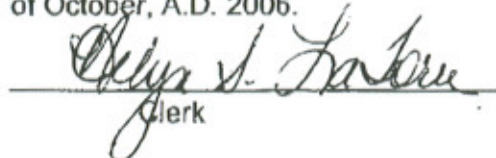
18 U.S.C. § 201(c)
18 U.S.C. § 209

A true bill


Foreperson

Filed in open court this 11th day

of October, A.D. 2006.


Clerk

Bail \$

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